

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

THOMAS E. LUNNEEN,

Plaintiff,

vs.

BERRIEN SPRINGS, VILLAGE OF, et al.,

Defendants.

Case No. 1:20-cv-1007-HYJ-PJG

Hon. Hala Y. Jarbou

Hon. Mag. Judge Phillip J. Green

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**INDEX OF ECF CITES AND EXHIBITS  
TO PLAINTIFF'S JOINT RESPONSE IN OPPOSITION TO  
DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

**ECF CITES:**

<b>ECF No.</b>	<b>Title</b>
<b>1</b>	Complaint and Demand for Trial by Jury
<b>14</b>	Defendants Berrien County, L. Paul Bailey, and Roger Johnson's Answer to Plaintiff's Complaint, Reliance on Jury Demand and Affirmative Defenses

<b>15</b>	Defendants Berrien Springs, Oronoko Township, James Wyss, and Paul E. Toliver's Answer to Complaint, Reliance on Jury Demand, Affirmative Defenses and Certificate of Service
<b>44</b>	Certificate of Service of Plaintiff's First Set of Requests for Production and Interrogatories to Defendant James Wyss
<b>57-1</b>	Jeffrey J. Noble, J.D.'s Expert Report
<b>57-3</b>	Michael M. Baden, M.D.'s Expert Report
<b>57-7</b>	Michael D. Freeman, M.D.'s Expert Report
<b>57-11</b>	Daniel Wohlgeleirnter, M.D.'s Expert Report
<b>57-15</b>	Douglas Thornton's Report
<b>78</b>	Brief in Support of Defendants Berrien County, L. Paul Bailey, and Roger Johnson's Motion for Summary Judgment pursuant to Rule 56(a)
<b>81</b>	[Township] Defendants' Motion for Summary Judgment
<b>81-2</b>	Deposition Transcript of James Wyss
<b>81-3</b>	Deposition Transcript of Roger Johnson
<b>81-6</b>	Postmortem Examination Report

#### **EXHIBITS:**

<b>Exhibit No.</b>	<b>Title</b>
<b>1.</b>	James Wyss's Statement to Michigan State Police
<b>2.</b>	Village Map
<b>3.</b>	Video1
<b>4.</b>	Map
<b>5.</b>	Prior Encounters
<b>6.</b>	Call for Service Report
<b>7.</b>	911 Call
<b>8.</b>	Roger Johnson's Statement to Michigan State Police
<b>9.</b>	Michigan State Police Incident Report
<b>10.</b>	Video2
<b>11.</b>	Deposition Transcript of Thomas Lunneen – Excerpts 30
<b>12.</b>	Taser Pulse Logs
<b>13.</b>	James Wyss's Training Records
<b>14.</b>	Roger Johnson's Training Records
<b>15.</b>	Medical Examiner's Report
<b>16.</b>	Autopsy Photographs
<b>17.</b>	Deposition of Elizabeth A. Douglas, M.D. – Excerpts 36, 62, 65, 68, 69, 72, 80, 87, 90, 91, 93, 97-98
<b>18.</b>	James Wyss's Administrative Leave Letter
<b>19.</b>	Roger Johnson's Administrative Leave Letter
<b>20.</b>	Berrien Springs-Oronoko Township Incident Report
<b>21.</b>	Berrien County Prosecutor's Office's Memo to Investigating Officer

22.	Plaintiff's First Set of Requests for Production to Defendant James Wyss
23.	Plaintiff's First Set of Interrogatories to Defendant James Wyss
24.	Berrien Springs-Oronoko Township Police Department's Policies & Procedures
25.	Berrien County Sheriff's Department's Policies & Procedures
26.	Deposition Transcript of Chuck Heit
27.	Roger Johnson's Lifesaving Award

Respectfully submitted this 15th day of July 2022,

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of July 2022, I served this document electronically via email on the following persons:

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